_	FLEDENTEREDENTEREDRECEIVED
1	AUG 0 2 2004 ZG
2	
3	AT SEATTLE CLERK U.S. DISTRICT COURT WESTERN DISTRICT OF WASHINGTON DET
4	
5	
6	UNITED STATES DISTRICT COURT
7	WESTERN DISTRICT COORT WESTERN DISTRICT OF WASHINGTON AT SEATTLE
8	INTERSOR ANDREAS
10	Plaintiff, Plaintiff, Plaintiff,
11	v. Information
12	<b>\</b>
13	DEVAUGHN DORSEY, ) AKA: ERIC ROBERTS, ) AKA: BUSTER JONES )
14	Defendant. }
15	
16	04-CR-00352-INFO The United States Attorney charges that:
17	
18	COUNT 1
19	(Conspiracy) A. The Agreement
20	At an exact time unknown, but beginning within the past five years and
21	continuing until on or around April, 2004, within the Western District of Washington and
22	elsewhere, DEVAUGHN DORSEY, AKA: ERIC ROBERTS, AKA: BUSTER JONES,
23	together with others, did knowingly and willfully conspire, combine, confederate and
24	agree with other persons and with others known and unknown to the United States
25	Attorney, to commit the following offenses against the laws of the United States:
26	a. To receive, unlawfully possess, or obtain control of, with intent to
27	sell or otherwise dispose of, motor vehicles and motor vehicle parts, knowing that the
28	

- b. To knowingly own, operate, maintain, and control a chop shop, or conduct operations in a chop shop, in violation of Title 18, United States Code, Section 2322; and
- c. To knowingly remove, obliterate, tamper with, or alter identification numbers for motor vehicles, in violation of Title 18, United States Code, Section 511.

## B. The Purpose of the Conspiracy

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

The purpose of the conspiracy was to obtain stolen motor vehicles; to alter and/or remove the vehicle identification number from the stolen vehicles, and then to sell the stolen motor vehicles or parts removed from the vehicles, both within the state of Washington and in interstate commerce. During the course of the conspiracy, the defendant obtained in excess of twenty stolen motor vehicles, valued in excess of \$400,000.

## C. Manner and Means of the Conspiracy

- 1. The defendant and his co-conspirators used the following means and acted in the following manner, among others, to effect the conspiracy:
- a. It was a part of the conspiracy to steal, receive, or possess stolen motor vehicles.
- b. It was further a part of the conspiracy to alter, counterfeit, disguise, falsify, forge, obliterate, tamper with, or remove the identity of stolen motor vehicles, including the vehicle identification numbers.
- c. It was an object of the conspiracy to distribute, sell, or dispose of such vehicles in interstate commerce.

## D. Overt Acts

In furtherance of the conspiracy and to effect the objects thereof, the defendant and his co-conspirators committed the following overt acts within the Western District of Washington:

1	a. On or about March 17, 2000, DEVAUGHN DORSEY, together with
2	others, possessed a stolen 1995 Chrysler Town and Country van, whose VIN had been
3	switched to that of a 1991 Plymouth Voyager.
4	b. On or about March 17, 2000, DEVAUGHN DORSEY, together
5	with others, possessed a stolen 1997 GMC twenty four foot Penske truck.
6	c. On or about January 17, 2001, DEVAUGHN DORSEY stole a
7	1987 Chevrolet El Camino from Chaplain Chevrolet.
8	d. On or about January 18, 2001, DEVAUGHN DORSEY stole a
9	1995 Ford Taurus from Wild West Trucks, and switched the VTN on the vehicle.
10	e. On or about January 19, 2001, DEVAUGHN DORSEY stole a
11	1997 Ford Expedition.
12	f. On or about July 12, 2001, DEVAUGHN DORSEY stole a 1987
13	Chevrolet El Camino and switched the VIN on the vehicle.
14	g. On or about August 31, 2001, DEVAUGHN DORSEY stole a
15	1989 Cadillac Fleetwood and switched the VIN on the vehicle.
16	h. On or about May 21, 2003, DEVAUGHN DORSEY stole a 1986
17	Chevrolet El Camino from K.O. and switched the VIN.
18	i. On or about June 25, 2003, DEVAUGHN DORSEY stole a 1999
19	Cherolet pick-up truck and switched the VIN on the vehicle.
20	j. On or about July 8, 2003, DEVAUGHN DORSEY stole a 2001 Ford
21	F150 Pick-up truck from Bay Ford in Port Orchard, Washington.
22	k. On or about August 8, 2003, DEVAUGHN DORSEY stole a 2000
23	Cadillac from Brotherton Cadillac and altered the VIN.
24	1. On or about August 9, 2003, DEVAUGHN DORSEY possessed a
25	stolen 1992 tow truck.
26	m. On or about August 15, 2003, DEVAUGHN DORSEY stole a 2004
27	Jeep from Lithia Dodge in Renton.
28	

1	n. On or about August 19, 2003, DEVAUGHN DORSEY possessed a
2	1957 Chevrolet Bel Air, knowing it had been stolen and knowing that the VIN had been
3	switched.
4	o. On or about August 19, 2003, DEVAUGHN DORSEY possessed a
5	stolen 2004 Jeep Cherokee, knowing it had been stolen and knowing that the VIN had
6	been switched.
7	p. On or about August 19, 2003, DEVAUGHN DORSEY possessed a
8	stolen 1995 GMC Suburban, knowing it had been stolen and knowing that the VIN had
9	been switched.
10	q. On or about August 19, 2003. DEVAUGHN DORSEY possessed a
11	stolen 1992 Cadillac, knowing it had been stolen and knowing that the VIN had been
12	switched.
13	r. On or about September 2, 2003, DEVAUGHN DORSEY stole a
14	2004 Jeep Grand Jerokee and removed the VIN plate from the vehicle.
15	s. On or about September 2, 2003, DEVAUGHN DORSEY stole a
16	2004 Chrysler Pacifica.
17	t. On or about October 7, 2003, DEVAUGHN DORSEY stole a 1997
18	Cherolet pickup truck from Biddle Chevrolet in Bothell.
19	u. On or about October 21, 2003, DEVAUGHN DORSEY stole a 2003
20	Ford F-150 pick-up truck from Harris Ford in Lynnwood.
21	v. On or about January 16, 2004, DEVAUGHN DORSEY stole a 1998
22	Cadillac Seville from Sound of Auburn and switched the VIN.
23	w. On or about February 19, 2004, DEVAUGHN DORSEY knowingly
24	possessed the following stolen cars: a 2001 Dodge Intrepid; a 2002 Chevrolet Avalanche;
25	a 2003 Buick LeSabre; and a 2000 Chevrolet S-10 pickup truck.
26	y. The defendant did, and caused to be done, the acts set forth in Count
27	2 of this Information, which is incorporated by reference and alleged as a separate overt
28	act as if set forth in full herein.

All in violation of Title 18, United States Code, Section 371. 1 COUNT 2 2 (Operating a Chop Shop) 3 On or about February 19, 2004, in King County, Washington, within the Western 4 District of Washington, DEVAUGHN DORSEY did knowingly operate, maintain, or 5 control a chop shop, and conducted operations in a chop shop, located at 12027-77th 6 Avenue South, in King County, Washington. 7 All in violation of Title 18, United States Code, Sections 2322(a)(1) and (b). 8 9 DATED this 2d day of August, 2004. 10 11 12 13 ited States Attorney 16 17 Assistant United States Attorney 18 19 20 Assistant United States Attorney. 21 22 23 24 25 26 27 28